

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO

DAVID GOMEZ and ESMA GOMEZ,

Plaintiffs,

v.

No.

STATE FARM MUTUAL AUTOMOBILE
INSURANCE COMPANY,

Defendant.

AFFIDAVIT OF TERRY R. GUEBERT

COMES NOW, Terry R. Guebert, Esq., being first duly sworn upon his oath and states:

1. I am lead attorney for Defendant State Farm Mutual Automobile Insurance Company.

2. I am licensed to practice law in the state of New Mexico and before this Court. I have been an attorney since 1976.

3. The majority of my practice for the past 35 years has involved personal injury, product liability and insurance claims where I have been retained to defend either an insurance company directly, or an insured who has been made a party to a lawsuit. During the course of my career, I have tried in excess of 80 cases to juries in New Mexico. Over the past 35 years, I have evaluated hundreds of claims made against insurance companies and their insureds.

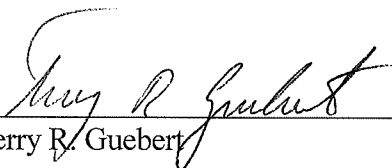
4. In my position as lead counsel, I have been actively involved in the evaluation of the injuries and damages asserted by the Plaintiffs.

5. The Plaintiffs assert that State Farm, among other things, failed to pay Plaintiffs' damages suffered in an auto accident, medical expenses, and pain and suffering.

6. Plaintiffs have claimed numerous damages in his lawsuit against State Farm, including damages in an amount sufficient to compensate Plaintiffs for actual and consequential damages, attorney's fees and costs, pre-judgment interest, post-judgment interest, and punitive damages. In addition, Plaintiffs request other and further relief as the Court deems just and proper.

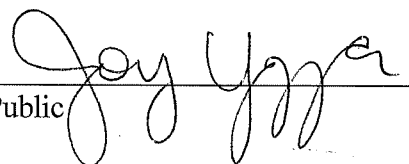
7. It is my experience in litigating first party insurance claims such as the claims alleged by the Plaintiffs, that if the Plaintiffs' claims are accepted by a jury, the actual and consequential damages award, punitive damages award, and attorney's fees award combined will be in excess of \$75,000.00.

8. All of the foregoing statements are made upon my personal knowledge and belief.


Terry R. Guebert

STATE OF NEW MEXICO)
) ss.
COUNTY OF BERNALILLO)

SUBSCRIBED AND SWORN to before me this 16th day of October, 2017 by
Terry R. Guebert.


Notary Public

My Commission Expires:

1-11-18
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